

AGENDA
Solid Waste Advisory Committee (SWAC)
March 24, 2021; 3 pm

****ATTENTION**** In response to the current Governor's order Clallam County has moved Phase 3 of the Healthy Washington Roadmap to Recovery Plan and are following general requirements for COVID safety for meetings held in the Board of Commissioners Board Room as follows:

1. All attendees are encouraged to provide contact information on a sign in sheet which will be retained for 28 days for contact tracing purposes.
2. Public seating areas and Board member seating must be arranged to ensure physical distancing is maintained.
3. Meeting attendees must wear a proper face covering and maintain six feet of physical distance between other persons.
4. No food or drink should be consumed in the BOCC Board Room.
5. Meeting organizers shall clean or arrange to have cleaned high-touch surfaces before and after each meeting.
6. Hand sanitizing stations will be available in the BOCC Board Room.
7. Keep doors and windows open where possible to improve ventilation.
8. The Chair of the meeting shall ensure masking and social distancing practices are enforced and practices by all event attendees.

This meeting can be viewed on a live stream at this link:

<http://www.clallam.net/features/meetings.html>

If you would like to participate in the meeting by phone call 408-419-1715 or participate by video conference visit www.bluejeans.com and join the Regular Meeting. Use Meeting ID 646 478 340 to access via either route.

- I. Call to order, roll call
- II. Request for modifications/addition to agenda
- III. Approval of minutes for the meeting on December 16, 2021
- IV. Public Comment
- V. Update on Regional Solid Waste Contract—*City of Port Angeles*
- VI. Solid Waste Management Plan (SWMP) update (*Green Solutions*)
 - o Public, WUTC, Department of Ag, SEPA comments and response
 - o Ecology Review of Preliminary Draft
- VII. Future Agenda Items Discussion (4:45-5 pm)
 - Next Steps for SWMP
 - Next SWAC meeting scheduled 5/26/21
- VIII. Adjournment

Abbreviations: City of Port Angeles (CoPA), City of Sequim (CoSq), Clallam County Public Works (CCPW) & Environmental Health (CCEH), Waste Connections (WC), Green Solutions (GS), Solid Waste Management Plan (SWMP), Solid Waste (SW), Department of Ecology (ECY), Clallam County (ClaCo)

I. Call to Order (3:01pm). Roll Call:

- A. Members (quorum): Meggan Uecker (ClaCo Alt); Ann Soule (CoSq Public Works Alt); Chad Young (WC Rep)/ Brian Tate (WC Alt); Charlie McCaughan (CoPA rep)/LaTrisha Scruggs (CoPA alt); Arleen Jenson (Ag Rep), Cynthia Bork (Citizen Alt)
- B. Staff: Rick Hlavka and Sharon Conroy (GS); David Pater (ECY); Megan Juran (CCPW); Thomas Hunter, Gregg King (CoPA), Eli Owens (CCEH)
- C. Missing: Mark Ozias (ClaCo); Steve Pendleton (Makah Tribal Rep); Brent Gagnon (West Waste rep), Keith Larkin, (CoSq rep), Christy Cox (Citizen Rep)
- D. Public: Brian Berardo

II. Request for Modifications/Additions to Agenda

- A. No changes.

III. Approval of Minutes for the Meeting on October 23, 2020

- A. Motion to approve minutes by Cynthia, Jenson seconded. Approved.

IV. Public Comment

- A. None.

V. Informational Presentations

- None

VI. Discussion Items

A. SWMP Review

- 1. Current draft of Executive Summary, Chapters 1-11 and CROP has minimal tracked changes (redlined) of changes last discussed in each chapter. Includes redline changes to recommendations from Chs. 3-7 made at last SWAC. If no comments, these will be accepted.
- 2. SWAC reviewed recommendations for Chs. 8-11, plus HWP.
 - Ch. 8:
 - ✓ O5-Jenson thought needs more robust language. Meggan pointed out that WR7 supported that intent.
 - ✓ Cynthia felt recs were too general. GS noted they were purposefully broad. Additional info is within the chapter (current situation, planning issues, alternatives) that can be used to support recommendations.

- Ch. 9:
 - ✓ MW6—‘carcasses’ not the right word. Need to differentiate MW 5 (animal carcasses) from game meat donation of MW6.
 - ✓ MW9-what is the cost for? Eli and Meggan thought staff time/advertising for promotion.
 - ✓ MW10-spell out C&D
- Ch. 10:
 - ✓ R&A4—Thomas asked what intent/extent of SW district. Jr. taxing district. Could be disposal or collection. Only a few in the state, usually politically controversial, hence investigate only. Language to investigate from ILA.
 - ✓ R&A5/6-Gregg asked how this impact rates, what is “sufficient”? Fuller text of 5 focuses on system infrastructure TBD. Fuller text of 6 focuses on County as state grant lead.
- General SWMP comments:
 - ✓ Ann—how many callouts? Couldn’t remember, but GS will add to table of contents.
 - ✓ ECY/David: review so far notes a good plan that meets min. requirements. Will provided written comments from David & Peter Guttchen (statewide planning lead) that may include some required changes. GS was concerned these would need to come to SWAC. County will decide if necessary prior to submission of Preliminary Draft.

VII. **Future Agenda Items**

- A. Next steps:
 - ✓ GS will produce draft accepting current changes but redlined w/ new changes from this meeting, provide to Meggan. Pending ECY comments, will work w/ County to prepare preliminary draft to submit to state.
 - ✓ Schedule 4b shows draft schedule for '21 until plan finalization.
 - ✓ Public hearing (hosted by County), Utilities Advisory Committee (CoPA) & Sequim Planning Commission presentations being scheduled for Jan/Feb/March.
 - ✓ SEPA review/comment period will also occur Jan/Feb.
- B. SWAC schedule for '21
 - ✓ Jan meeting will be public hearing, optional but encouraged attendance.
 - ✓ Meet every other month, same time/day, starting March.

VIII. **Adjournment (5pm)**

MEMORANDUM

DATE: March 18, 2021
TO: Clallam County SWAC Members
FROM: Rick Hlavka and Sharon Conroy
RE: Comments on the Solid Waste Plan and Proposed Revisions

The purpose of this memo is to address the first round of comments that were received on the Preliminary Draft of the Clallam County Solid Waste Management Plan (the Plan) during the public comment period that was open from January 15 through March 5, 2021. We expect to receive additional comments from the Department of Ecology and will address those in a separate memo.

Comments have been received from five sources:

- Lindsey Schromen-Wawrin, submitted by email on January 12, 2021.
- Brian Berardo, submitted by email on January 21, 2021.
- Eli Owens, submitted by email on January 28, 2021.
- Ann Soule, submitted by email on February 9, 2021.
- Jamestown S'Klallam Tribe, submitted by email on March 3, 2021.

These comments are addressed below, and copies of the original comments are attached.

It should be noted that the Plan was also reviewed by the Washington Utilities and Transportation Commission and the Washington Department of Agriculture. Neither of those agencies had any specific comments on the Plan. A State Environmental Policy Act (SEPA) review was completed by the Clallam County Department of Community Development and a Determination of Non-Significance (DNS) was issued for public comment from February 18 to March 4, 2021. There was also a public meeting for the Plan that was conducted virtually on February 9, 2021. There were a number of people in attendance at that meeting and there was interesting discussion on aspects of the Plan, including a question about how the Plan relates to State efforts such as the plastic packaging study, but there were no specific comments made at that meeting.

COMMENTS RECEIVED FROM LINDSEY SCHROMEN-WAWRIN

Lindsey Schromen-Wawrin provided one comment on the terminology used in the Plan.

1. The word "shall" should be changed to "must": Lindsey Schromen-Wawrin points out that the State Legislature is moving away from the use of "shall" to instead use "must," which is felt to have the same meaning but is thought to be clearer.

Discussion: A quick internet search confirmed that “shall” does not have the meaning that we thought. There was a recent Supreme Court case, in fact, where it was concluded that “shall” only means “may,” whereas “must” is a word that means something is mandatory. The Plan uses the word “shall” in 11 places. Seven of these are direct quotes of State and local ordinances and so cannot be changed in the Plan. The other four instances are all due to the same recommendation: “R&A1) Clallam County and the Cities of Port Angeles and Sequim shall continue to meet their respective commitments as specified in the ILA for the Regional Solid Waste Export and Transfer System.”

Recommendation: R&A1 should be revised to say “must” instead of “shall.”

COMMENTS RECEIVED FROM BRIAN BERARDO

Brian Berardo provided one comment on the idea of styrofoam recycling.

1. The Plan should recommend a styrofoam recycling program: Brian Berardo notes that the longevity of styrofoam is a problem and so this material should be recycled. He proposed a volunteer-run collection program to collect styrofoam and ship it to Styro Recycle in Kent.

Discussion: Counties, cities and various organizations hold occasional styrofoam collection events. There are significant cost and contamination issues with these events. Although it sounds like Brian Berardo is aware of these issues, this idea still needs to be approached cautiously. Recent State legislation has considered styrofoam bans, which could provide a better long-term solution.

Recommendation: If County or City staff and SWAC members are interested in pursuing this further, it could be discussed with Styro Recycle. But a pilot project or other program for styrofoam would not need to be mentioned in the Plan in order for it to move forward.

COMMENTS RECEIVED FROM ELI OWENS

Eli Owens provided one comment on Stericycle.

1. Stericycle’s name should be changed to CleanEarth: Eli commented that the name should be changed now to reflect the ownership of Stericycle.

Discussion: A quick internet search was inconclusive but it looks like Stericycle might continue to operate under that name. It’s easy enough to change it, however, as Stericycle is mentioned only three times in the Plan.

Recommendation: We should change Stericycle to CleanEarth, perhaps with the additional note “formerly operating as Stericycle.” Although in Chapter 9 we may

wish to leave Stericycle and add “(now known as CleanEarth)” because that part refers to the UTC tariff that has not been updated for the name change yet.

COMMENTS RECEIVED FROM ANN SOULE

Ann Soule provided several comments to Meggan Uecker in an email chain discussing a solid waste guide, but later it was determined that only one comment pertained to the Plan.

1. A subtitle could be added to note that the Plan includes the cities as well: Ann notes that the names of the three cities included in the Plan could be added as a subtitle on the front cover.

Discussion: We would point out that the cities are already listed on the inside cover page but we’re happy to add something to the front cover too if others would like to see that.

Recommendation: We can add a subtitle to the front cover if requested to do so.

COMMENTS RECEIVED FROM THE JAMESTOWN S’KLALLAM TRIBE

The Jamestown S’Klallam Tribe (JKT) provided several comments on the Plan. These are summarized below, and the full comments can be seen in the attached copy of their letter. Their comments are organized into four groups: items that are strongly supported, items that they disagree with, suggested changes and a question.

Items that JKT expressed strong support for:

1. Recommendation WC1, to consider a service level ordinance that requires curbside recycling for garbage customers: JKT lists several reasons why a service level ordinance that combines curbside recycling services with garbage collection would be advantageous.

Discussion: These are all good points to consider at a later date in support of the examination of a service level ordinance.

Recommendation: No revisions to the Plan are proposed in response to this comment.

2. Recommendation WC2, to investigate universal collection service: JKT points out that this would reduce illegal dumping.

Discussion: This is also a good point to consider at a later date in support of the consideration of universal collection service.

Recommendation: No revisions to the Plan are proposed in response to this comment.

3. Recommendation WD1, to evaluate future proposals for alternative disposal facilities: JKT points out that these types of facilities take a long time to implement and that the process should begin immediately.

Discussion: It should be noted that this Plan is not a biosolids management plan, and that biosolids are only mentioned in passing because they are co-managed with yard waste. This Plan lacks the jurisdiction to do anything more than that.

Recommendation: No revisions to the Plan are proposed in response to this comment.

4. Recommendation WR1, to continue to promote waste reduction activities: JKT provides a number of interesting ideas for additional waste reduction activities.

Discussion: These ideas can be pursued by County staff and others without needing to list them in the Plan.

Recommendation: No revisions to the Plan are proposed in response to this comment.

5. Recommendation WR10, to investigate the potential for a broader ban on plastic packaging: JKT's next comment again provides some good ideas on this activity.

Discussion: These ideas can be pursued by County staff and others without needing to list them in the Plan.

Recommendation: No revisions to the Plan are proposed in response to this comment.

6. Recommendation MW10, to promote C&D recycling: JKT's next comment appears to voice support for stronger actions in this area, by requiring contractors to either recycle or bring wastes to a recycling facility.

Discussion: Requiring contractors to recycle waste was discussed as part of the C&D section in Chapter 9 (Miscellaneous Solid Wastes), however it was noted that no recycling facilities exist in Clallam County for C&D wastes. Therefore, requiring recycling was not chosen to become a recommendation at this time.

Recommendation: No revisions to the Plan are proposed in response to this comment.

7. Recommendation R&A2, to investigate a flow control ordinance: JKT's next comment notes that flow control is a good approach and should have a deadline.

Discussion: In Table 11-1 and ES-1, this activity is shown as occurring by 2024.

Recommendation: No revisions to the Plan are proposed in response to this comment.

Items that JKT disagreed with:

8. Recommendation T6, to consider fees at transfer stations and drop box facilities for recyclables: JKT voiced concern that this would discourage recycling and that instead the service should be expanded to allow businesses to recycle there.

Discussion: These are all good points to consider at a later date when user fees are being considered further.

Recommendation: No revisions to the Plan are proposed in response to this comment.

9. Biosolids should not be composted and waste imports of biosolids and yard waste should be discontinued: JKT voiced concern that biosolids are not safe for land application.

Discussion: As noted above, this Plan is not intended to be a biosolids management plan. It should also be noted that biosolids are not the same as sludge, with the idea being that biosolids have been treated in some way to create a safer product.

Recommendation: No revisions to the Plan are proposed in response to this comment.

10. Biosolids and yard waste should not be imported: JKT again voiced concern that biosolids are not safe for land application.

Discussion: As noted above, this Plan is not intended to be a biosolids management plan.

Recommendation: No revisions to the Plan are proposed in response to this comment.

11. In Table 10-2, a fee is shown for recycling but recycling should be free: JKT voiced support for making recycling free by incorporating those costs into solid waste facility costs.

Discussion: Table 10-2 is the table showing permit fees that are charged by the Health department for various solid waste facilities. Combining fees in this case would not be practical, especially if a stand-alone recycling facility (not associated with a solid waste facility) was being permitted.

Recommendation: No revisions to the Plan are proposed in response to this comment.

Additional suggestions from JKT:

12. Use “will” instead of “should”: JKT commented that the use of “will” would be a better term, and also commented that showing activities as “ongoing” is not clear as far as deadlines.

Discussion: The terms used in the recommendations have been discussed at length by the SWAC and the terms used were chosen with care. The point of showing activities as ongoing is important in the sense that the Plan is committing to continuing these activities.

Recommendation: No revisions to the Plan are proposed in response to this comment.

13. The fact that Table ES-1 is identical to Table 11-1 should be stated: JKT commented that Tables ES-1 and 11-1 are identical and that should be pointed out.

Discussion: This could be clarified by adding a footnote to Table ES-1 to note that it is identical to Table 11-1 and that additional implementation details can be found in Chapter 11.

Recommendation: Add a footnote to Table ES-1 as described above..

14. Population figures should be re-visited: JKT points out that the population figures shown in the Plan are low compared to census estimates.

Discussion: The Plan uses official figures from the State Office of Financial Management, which could be outdated since it's now been ten years since those numbers have been updated by fresh census data. However, we are not interested in replacing those with preliminary data from the census, which could also be subject to change.

Recommendation: No revisions to the Plan are proposed in response to this comment.

Question from JKT:

15. Who pays “special user fees”? JKT asked about the special user fees mentioned on pages 159 and 164.

Discussion: These fees are paid by customers of specific services.

Recommendation: We could clarify this if the SWAC feels it is helpful, but for now there are no revisions to the Plan that are proposed in response to this question.

NEXT STEPS

If acceptable to the SWAC members and municipal stakeholders, the revisions described above should be included in the next copy of the Plan. Note that comments from Ecology will also need to be addressed in a similar fashion at a later date.

Rick Hlavka

From: Uecker, Meggan <muecker@co.clallam.wa.us>
Sent: Monday, March 08, 2021 10:57 AM
To: Rick Hlavka-Green Solutions; Sharon Conroy-Green Solutions
Subject: FW: RE: "shall"

From: Lindsey Schromen-Wawrin [mailto:lswawrin@cityofpa.us]
Sent: Tuesday, January 12, 2021 4:28 PM
To: Thomas Hunter; Uecker, Meggan
Cc: Gregg King; Bill Atkinson
Subject: Fwd: RE: "shall"

*** EXTERNAL EMAIL *** This message was sent from outside our County network.

Meggan and Thomas,

My first SWCP comment. ;)

Please change the Solid Waste Comprehensive Plan's use of "shall" to "must." See reasons in state legislature code reviser comments and other references below (while "shall" is still technically correct when it means "has a duty to," it is much clearer to just say "must").

Thank you,

Lindsey

--

Lindsey Schromen-Wawrin (he/him/his)
Port Angeles City Councilmember
(360) 406-4321

NOTICE: All email correspondence to and from this address is subject to the Washington State Public Records Act, which may result in monitoring and archiving as well as disclosure to third parties upon request.

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----- Forwarded Message -----

Subject: RE: "shall"

Date: Wed, 30 May 2018 16:52:59 +0000

From: Buchli, Kathleen <Kathleen.Buchli@leg.wa.gov>

To: lswawrin@cityofpa.us <lswawrin@cityofpa.us>

CC: Thiessen, Kyle <Kyle.Thiessen@leg.wa.gov>

Hi Lindsey,

Thank you for your question on the use of "shall" versus "must." It sounds like you have reviewed the Bill Drafting Guide in your research and as stated in the guide, "shall" is intended to only mean "has a duty to." In practice, we encourage the use of "must" and will draft new legislation using "must" instead of "shall" as appropriate.

Of course, there are many instances of the word "shall" in code. We find that it is best to leave those in place to avoid appearances that the bill is changing more than just the policy of the bill itself (although some drafters try to update those references to "must" if the client permits). Some members of the legislature prefer to use "shall" and we defer to their wishes so long as the duty is clear.

Best, Kathy
Kathleen Buchli
Code Reviser Designate
Office of the Code Reviser
Phone: 360.786.6985
kathleen.buchli@leg.wa.gov

-----Original Message-----

From: CRO Front Desk Sent: Wednesday, May 30, 2018 8:07 AM
To: Buchli, Kathleen <Kathleen.Buchli@leg.wa.gov>; Thiessen, Kyle <Kyle.Thiessen@leg.wa.gov>
Subject: FW: "shall"

-----Original Message-----

From: Lindsey Schromen-Wawrin <lsawrin@cityofpa.us> Sent: Wednesday, May 30, 2018 7:25 AM
To: CRO Front Desk <CROFRONTDESK@leg.wa.gov>
Subject: "shall"

Office of the Code Reviser,

A city attorney and I were recently discussing "shall," and I think she convinced me to abandon using "shall" in legislative drafting (even for legal duties).

It looks like Garner has been advocating for this for a while,
http://www.abajournal.com/magazine/article/shall_we_abandon_shall , and even a critic who thinks "shall" should remain in corporate contracting agrees "that it would be best to eliminate 'shall' from statutes and consumer contracts,"
<http://www.adamsdrafting.com/downloads/nylj-shall-101807.pdf>

The Washington State Bill Drafting Guide, at
http://leg.wa.gov/CodeReviser/Pages/bill_drafting_guide.aspx#Shall%2c_may%2c_and_must
, presents the use of "shall" for legal duties and says "'must' creates a condition precedent." Before becoming an anti-shall convert, I wanted to check with the Code Reviser's office on where the state is at with considering "shall" and its alternatives in the state code?

Thank you,
Lindsey

Rick Hlavka

From: Uecker, Meggan <muecker@co.clallam.wa.us>
Sent: Monday, March 08, 2021 10:57 AM
To: Rick Hlavka-Green Solutions; Sharon Conroy-Green Solutions
Subject: FW: Comment re: Preliminary Draft Clallam County Solid Waste Management Plan

From: Brian Berardo [mailto:bberardo@yahoo.com]
Sent: Thursday, January 21, 2021 1:06 PM
To: Peterson, Mary
Cc: Uecker, Meggan; Brian Berardo
Subject: Comment re: Preliminary Draft Clallam County Solid Waste Management Plan

*** EXTERNAL EMAIL *** This message was sent from outside our County network.

Good day!

First of all kudos to SWAC for all the hard work that they and others have been doing to arrive at this Preliminary Draft of the Clallam County Solid Waste Management Plan. It's a testament to the benefits of smart and dedicated people working together to produce a quality document.

Unfortunately, I'm unable to attend the public meeting on February 9th at 6:30 PM to discuss, so I'm writing this in lieu of attending that meeting and expressing my interest in the following:
I'm interested in adding a section under 7.4 and the paragraph **Recycling Drop-Off Services**. I'm very much interested in seeing the inclusion of collection bins/boxes/containers for Polystyrene products. [Home | Styro Recycle Ilc](#) is located in Kent, WA and will take diverse **clean** polystyrene products and recycle them. The half-life of many of these products is upwards of hundreds of thousands of years, if not millions of years (it's a bit difficult to accurately assess when we get up in this range). The good news is that, while more and more industries and manufacturing concerns are switching to more recyclable materials such as paper products, but we're definitely not there yet and probably won't be for quite some time.

Home | Styro Recycle Ilc

We recycle styrofoam for businesses, hospitals, and home owners in the Seattle/Tacoma and Puget Sound area of Wa...

I'm confident we can obtain a labor force to go through the collected polystyrene products and filter out the clean and acceptable varieties. I'm willing to donate my time to coordinate such a labor force, and possibly periodically drive these materials to Kent for recycling. They do not pay for the materials, but will recycle them for further use by companies using packing materials. I've spoken with the owner of Styro Recycle, LLC, one Marilyn Lauderdale, and she's graciously made the following offer:

"If you are successful in getting the Clallam County Solid Waste folks to at least look into doing a program like this, I would be happy to meet with you and them or at least get the email chain going so we can see how we can help your community in diverting EPS styrofoam from the landfill."

I think you would agree that the planet needs all the help it can get. Please advise if I can help further this effort. Thank you for your time and consideration.

Sincerely,

Brian Berardo

Manager, Angeles Business Partners, LLC

MBA, PMP, ITIL Certified

cell: 360.460.9421

email: bberardo@yahoo.com

website: <https://www.bberardo.com>

Rick Hlavka

From: Uecker, Meggan <muecker@co.clallam.wa.us>
Sent: Monday, March 08, 2021 10:57 AM
To: Sharon Conroy-Green Solutions; Rick Hlavka-Green Solutions
Subject: FW: RE: SW Plan

From: Owens, Eli
Sent: Thursday, January 28, 2021 10:58 AM
To: Uecker, Meggan
Subject: RE: SW Plan

We can probably safely have Rick change all the references of Stericycle to CleanEarth. Don't think it's worth rushing to make the change for the public meeting coming up, but can certainly have it in the to-do list.

Eli Owens

Environmental Health Specialist | | Social Distancing Center Operations Coordinator
Clallam County Health & Human Services
111 E. 3rd St. - 2nd Floor | Port Angeles, WA 98362
Telephone: 360.417.2358 | Email: elowens@co.clallam.wa.us



Rick Hlavka

From: Uecker, Meggan <muecker@co.clallam.wa.us>
Sent: Monday, March 08, 2021 10:56 AM
To: Rick Hlavka-Green Solutions; Sharon Conroy-Green Solutions
Subject: FW: SWMP "Guide" & other copy

From: Ann Soule [mailto:asoule@sequimwa.gov]
Sent: Tuesday, February 09, 2021 3:01 PM
To: Uecker, Meggan
Subject: RE: SWMP "Guide" & other copy

*** EXTERNAL EMAIL *** This message was sent from outside our County network.

Hi Meggan, Looking forward to tuning in this evening! I'll be in the peanut gallery, just FYI!

A couple ideas about the Plan itself – (1) wondering if a **subtitle** could be added to clearly indicate its direct relevance to the cities, too. (2) I was recently reminded of an idea from a while back that never got out: consider listing **section titles in the plan as actions** rather than passive verbs:

Chap 1 Intro
Chap 2 Bkgd of Planning Area >>> Who are we and what do we toss?
Chap 3 Solid Waste Collection >>> Collecting our wastes
Chap 4 Waste Transfer >>> Moving our wastes off the NOP
Chap 5 Disposal >>> Disposing of our wastes
Chap 6 Waste Reduction >>> Changing what we think of as "waste"
Chap 7 Recycling >>> Recycling Right
Chap 8 Organics >>> Handling food and other organic materials
Chap 9 Misc Wastes >>> How we're handling other "wastes"
Chap 10 Regulation and Admin >>> How our system is organized

This may be too far out for the plan itself and so perhaps appropriate for the Guide instead. I can make these suggestions when I focus on that (I'm still hoping for clarification about the target audience).

Anyway, best wishes tonight!
Ann

(I was reminded of using actions for headings when I was scanning through some docs for a tiny grant application we're working on – this one is from WDFW and I noted how nicely the headings are coordinate and engage the reader: <https://wdfw.wa.gov/sites/default/files/publications/00036/wdfw00036.pdf>)

From: Ann Soule
Sent: Friday, February 5, 2021 9:23 AM
To: Uecker, Meggan <muecker@co.clallam.wa.us>; 'Cynthia Bork' <cynthiambork@gmail.com>
Subject: RE: SWMP "Guide" & other copy



JAMESTOWN S'KLALLAM TRIBE

1033 Old Blyn Highway, Sequim, WA 98382

360/683-1109

FAX 360/681-4643

March 3, 2021

Meggan Uecker
Clallam County
223 East 4th St.
Port Angeles, WA 98362

RE: Solid Waste Management Plan Comments

Dear Ms. Uecker,

The health and well-being of the Jamestown S'Klallam Tribe (JST) and the Clallam County's communities are intricately tied to our waters and natural resources that are easily impacted by our waste stream. JST submits the attached comments for the Clallam County Solid Waste Management Plan (SWMP) preliminary draft dated January 2021. We appreciate the County's efforts to perform this thorough update of the SWMP and support the goal of 75% recycling by 2025. The Tribe supports restoration projects and commercial aquaculture of native and naturalized species to provide for local seafood, improve water quality and protect the Tribe's Treaty Rights. To that end, we strongly support keeping toxins and pharmaceuticals out of our soils and our waters and encourage the prompt evaluation of innovative solutions that achieve this.

We appreciate your consideration of these comments and thank you for this opportunity to participate in Clallam County's Solid Waste Management Plan.

Sincerely,

Sissi P. Bruch, PhD
Environmental Planning Biologist
Natural Resources Department
Jamestown S'Klallam Tribe
1033 Old Blyn Highway
Sequim, WA 98382
Phone: 360-461-3006
Email: sbruch@jamestowntribe.org

Comments – Clallam County Solid Waste Management Plan

Draft January 2021

Note: All quoted text comes from the Clallam County Solid Waste Management Plan Draft.

1. Strong Support:

- a. WC1 – “Consider a service level ordinance that requires curbside recycling for garbage collection customers.”
 - i. Include that there are no recycling costs. All additional recycling costs need to be included in the required garbage collection and cannot be separated out. This incentivizes recycling, instead of being penalized by requiring a recycling fee.
 - ii. By imbedding this fee into the garbage collection, once the recycling markets have improved, then recycling can start, and a fund will exist to make this happen.
 - iii. Since illegal dumping is a problem, this service level ordinance helps address this. Tribal lands are disproportionately affected by this illegal dumping and both WC1 and WC2 would help in reducing the need for people to dump illegally.
 - iv. Yard waste could also be automatically added and fold the costs into garbage disposal. This would reduce illegal burns.
- b. WC2 – “Clallam county should further investigate the impacts of instituting universal collection service throughout the county.” This will reduce the costs of cleanup up illegal dump sites.
- c. WD1 – “Evaluate future proposals for disposal facilities, anaerobic digestion, incinerators and waste conversion on a case-by-case basis.”
 - i. This needs to begin now, as it takes a long time to get a project approved, funded, designed, and built. Especially looking into pyrolysis for sewage sludge, instead of spreading it on the land. Ingested pharmaceuticals end up in the sewage sludge, along with hormones and other contaminants that are not being tested in our sludge before it is composted. From draft document: “Scientists have detected these chemicals in water, sediments and fish.” This greatly concerns the Jamestown Tribe as salmon in one of our community’s native foods and it is consumed in a high quantity. Anything that impacts our fish, has a direct impact on our people’s health.
 - ii. The example from the City of Spokane mass burn technology that generates electricity, while reducing the waste by 90% volume and 70% weight is worthwhile evaluating to reduce transportation costs and increase resiliency and energy production. Although it cannot compete with costs of waste exporting today, how long will this be true and how much do we value the control of locally generated energy? Starting to think about a new plant when it has become too expensive to export, is just too late.
- d. WR1 – “Continue to promote waste reduction activities.”
 - i. Work with McKinley to find better use of ash than landfilling it. 10 lbs. of clean wood ash is being sold for \$40.00. In some European incinerators, “the ash is beneficially reused.”
 - ii. Work with businesses such as West Port to recycle excess materials instead of landfilling them.
 - iii. Every item destined to the landfill cost us in transportation costs contributing to climate change. Effects of climate change affect all of us, especially Tribes that are being forced to relocate and make plans to retreat from the water’s edge.

- e. WR10 - Investigate the potential for a broader ban on plastic packaging.” Work with stores selling in Clallam County to try to reduce packaging – Costco, Walmart, etc. have sufficient pull to make a difference. Push for greater Extended Producer Responsibility of products.
- f. MW10 – “Promote existing opportunities for recycling of construction and demolition wastes as part of the public education efforts conducted for waste reduction and recycling.” “Require Construction Sites to Recycle On-Site or Use Certified Recycling Facilities.” Once contractors get on board with this, they find that they save money doing this.
- g. R&A2 – “Clallam County will investigate the benefits and drawbacks of adopting a flow control ordinance.” This is important and should have a set time.

2. Disagree:

- a. T6 – “Consider user fees at transfer and drop box facilities for recyclables.” This only incentivizes people to throw out recyclables since they already paid for trash pickup. The cost of recycling needs to come out of garbage pickup and processing. Otherwise, they will end up as garbage.
 - i. Allow businesses to use drop boxes at transfer stations. The cost of garbage pickup should pay for the processing of recyclables.
 - ii. User-Pay System for Recycling – this disincentivizes recycling. If there was no recycling, it would end up in the trash. The cost of recycling should come out of trash collecting and processing.
- b. “For the purpose of maintaining necessary ratios of biosolids to yard waste for proper composting, Waste Connections has previously imported yard waste from out of the county for use at the Compost Facility.” The county should consider alternatives to this. The compost created with biosolids should not be used to grow food.¹ The safer alternative to land spreading of sludge would be pyrolysis, which would result in surplus energy, no air pollution and biochar, a stable soil amendment that could be used for food production. This is the healthier, long-term solution for our county. This is an alternative that needs to be explored immediately. Do not import more yard wastes or biosolids.
- c. “Waste Import Alternatives: There are no waste import alternatives that are being considered at this time.” The alternative of not importing yard wastes and biosolids should be investigated along with pyrolysis.
- d. Table 10-2 – Make recycling free and incorporate these costs into the operations of the Municipal Solid Waste Facility.

3. Changes Suggested:

- a. Instead of “should” use “will” - More outcome-based items needed. Proposed recommendations are too general. Many “Ongoing” items in Table 11-1 should have interim deadlines to help guide staff and be able to set interim outcome-based measures along the way. This can help to document progress and see trends.
- b. Table ES-1 is the exact same as Table 11-1. Please state that.
- c. Table 2-2 – Population numbers seem to be low. The census 2019 estimates for Clallam County are 77,331 and the tables has 2020 as 74,707. Also, the trends seem low with the current influx of growth seen in Port Angeles and Sequim.

4. Question: Who gets to pay “Special User Fees?” (Page 159 and page 164).

¹ <https://ec.europa.eu/environment/waste/sludge/> “To provide protection against potential health risks from residual pathogens, sludge must not be applied to soil in which fruit and vegetable crops are growing or grown”



STATE OF WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

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February 11, 2021

Meggan Uecker
Utility Program Manager
Clallam County Public Works Dept.
223 E. Fourth Street, Suite 6
Port Angeles, WA 98362

**RE: Clallam County Solid Waste Management Plan, Preliminary Draft January 2021
Docket TG-210016**

Dear Meggan Uecker:

The Washington Utilities and Transportation Commission (Commission) has completed its review of the preliminary draft of the Clallam County Solid Waste Management Plan (Plan).

Commission staff contacted the County because the Plan indicated tip fees between 2021 and 2025 will be determined at a future date. The County responded that no increase in tip fees is planned or expected during the Plan period, and any program initiatives would be paid from existing fund balances.

The Plan includes a Contamination Reduction and Outreach Plan (CROP) for the county, with the goal of reducing the contamination levels of recycling materials. The CROP will address the collection of glass, which can contaminate other material such as paper, cross contamination such as plastic bottles caught in baled paper, inadvertent diversion of recyclable material to disposal, and ineffective removal of contaminants.

The CROP will be implemented in conjunction with a statewide plan and will consist initially of studies and outreach and education initiatives. The Plan identifies funding for CROP as tipping fees, and estimates \$12,000, but no forecasted increase in tipping fees is included in the Plan. The CROP also mentions a cost to service providers (for cart tagging, route mailers, etc.) and estimates the cost at \$28,000, which is to come from rates, but no further information is provided.

Meggan Uecker
Clallam County Public Works Dept.
February 11, 2021
Page 2

Commission staff finds no further financial rate impacts to ratepayers served by regulated solid waste collection companies in Clallam County and has no further comments on the Plan.

Please direct questions or comments about the Commission's Plan review process to Benjamin Sharbono at (360) 664-1242 or benjamin.sharbnono@utc.wa.gov.

Sincerely,

Mark L. Johnson
Executive Director and Secretary

cc: David Pater
Department of Ecology
Solid Waste Management Program
300 Desmond Drive SE
Lacey, WA 98503



STATE OF WASHINGTON
DEPARTMENT OF AGRICULTURE

Division of Plant Protection

P.O. Box 42560 • Olympia, Washington 98504-2560 • (360) 902-1800

February 9th, 2021

Ms. Meggan Uecker
Utility Program Manager
Clallam County Public Works Dept.

Mr. David Pater
Solid Waste Planner, SWRO
WA Department of Ecology

Dear Ms. Uecker and Mr. Pater:

After reviewing the preliminary draft of the 2021 Clallam County Solid Waste Management Plan, our agency does not see any current conflicting compliance issues related to the apple maggot quarantine, as prescribed in Chapter 16-470-124 WAC.

Thank you for providing our agency with the opportunity to comment on the Clallam County solid waste management plan. RCW 70.95.095 requires the Washington State Department of Agriculture to review preliminary draft solid waste management plans for any increased risks of introducing a quarantine plant pest or disease into a pest free area.

Sincerely,

Amy Clow
Quarantine and Rules Coordinator
WSDA Plant Protection Division

cc:
Greg Haubrich, WSDA Pest Program Manager
Peter Guttchen, Department of Ecology
Peter Lyon, Department of Ecology

From: [Ballard, Greg](#)
To: [Uecker, Meggan](#)
Subject: RE: DNS for Non-project action of the 2021 Solid Waste Management Plan
Date: Friday, March 12, 2021 8:40:20 AM

No Comments were received regarding the DNS.

The DNS becomes final at the end of the comment period (March 4, 2021).

Thanks

Greg Ballard
Senior Planner
Clallam County Department of Community Development
223 E. 4th Street, Suite 5, Port Angeles, WA 98362
Direct Phone# (360) 565-2616 Fax# (360) 417-2443
Email: gballard@co.clallam.wa.us

From: Uecker, Meggan
Sent: Thursday, March 11, 2021 4:10 PM
To: Ballard, Greg
Subject: RE: DNS for Non-project action of the 2021 Solid Waste Management Plan

Hi Greg,

Were any comments received for this DNS? We have a Solid Waste Advisory Committee meeting soon and I hope to share all comments at that time. Please let me know by 3/18/21.

Thanks,
Meggan

From: Ballard, Greg
Sent: Thursday, February 18, 2021 4:11 PM
To: ECY SEPA Section (sepaunit@ecy.wa.gov); Luke Strong-Cvetich; Makah Fisheries (stephanie.martin@makah.com); 'Lower Elwha S'Klallam Tribe; Gretchen Kaehler (sepa@dahp.wa.gov.); Nicole Rasmussen (nicole.rasmussen@quileutenation.org)
Cc: 'Emma Bolin'; 'Tim Woolett'; City of Forks (rodf.forks@centurytel.net); Uecker, Meggan
Subject: DNS for Non-project action of the 2021 Solid Waste Management Plan

Attached is the DNS and SEPA Checklist for the 2021 Solid Waste Management Plan.

The DNS is issued on February 18, 2021 and the comment period ends on March 4, 2021.

Documents Associated with Cases on this Parcel
(Click Document to Open)
ECL2021-00003

[A1. DNS & SEPA Checklist 2021 Solid Waste Management Plan \(DNS & SEPA CHECKLIST 2021 SWMP\)](#)

[A2. SEPA Checklist \(SEPA CHECKLIST CLACOPW SWMP 1-6-2021\)](#)

[B1. Excerpt from the Executive Summary of the 2021 SWMP \(EXEC SUMMARY 2021\)](#)

SWMP)

B2. 2021 Clallam County Solid Waste Management Plan (PRELIMDRAFT CLALLAM COUNTY SOLID WASTE PLAN)

Please provide you SEPA comments to me.

Thanks

Greg Ballard

Senior Planner

Clallam County Department of Community Development

223 E. 4th Street, Suite 5, Port Angeles, WA 98362

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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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March 18, 2021

Meggan Uecker
Utility Program Manager
Clallam County Public Works Dept.
223 E. Fourth Street, Suite 6
Port Angeles, WA 98362-3015

Dear Ms. Uecker,

The Department Ecology has completed its review of the preliminary draft of the Clallam County Solid Waste Management Plan for Years 2021 to 2026 (Plan). The results of this review are included below.

We were impressed with the thoughtful and thorough approach you and your SWAC took to updating your Plan. We also appreciated your willingness to partner with us and to provide us sections of the Plan to review during the process. Because of this approach, a significant number of issues and questions had already been addressed before you submitted your preliminary plan for formal review. Our comments only include a few required changes and recommendations. Most of these items we have previously discussed.

The next step is for you to review and address our comments and then assemble your final submittal packet and to send your Plan to us for review and approval. There is no deadline for you to submit your final draft Plan. However, to ensure your Plan remains current, we encourage you to assemble your final packet and submit it as soon as is feasible for you. Once we receive your packet, we will send you formal notification of receipt of your Plan and will take action to approve or disapprove it within 45 days. If we do not notify you of our decision within 45 days, your Plan will be considered approved as submitted.

Below is a list of what you should include in your final submittal packet:

- **A transmittal letter formally requesting final Plan review.**
- **An electronic version of your Plan. Please assemble all required documents into one PDF.**

These documents should include:

- ✓ **Your UTC cost assessment** – *already submitted with your preliminary draft.*
- ✓ **All SEPA documentation** – *Needed. We understand that the process is completed.*
- ✓ **Copies of all inter-local agreements** – *Included with your preliminary draft submittal.*
- ✓ **Copies of your WSDA and UTC review letters** – *already provided to you.*

- ✓ **Resolutions of adoption from all participating jurisdictions** –*New resolutions need to be adopted by each jurisdiction and included with your final plan submittal.*
- ✓ **A response summary indicating how you addressed Ecology's preliminary draft Plan comments** – *The simplest way to do this is to note in the comments, how each of our comments was addressed in your final draft Plan. For recommended changes indicate if you did not think the change was necessary or you decided to address it in a different way.*
- ✓ **Evidence that your SWAC reviewed the Waste Reduction and Recycling element of your final draft Plan before it is submitted for final review and approval by Ecology. In your plan this element is included Section 5 - Waste Diversion.** – *[RCW 70.95.167\(3\)](#) requires that after the waste reduction and recycling element of the Plan is approved by the local legislative authority, but before it is submitted to Ecology for approval, the SWAC must hold another meeting to review the element. This requirement can be met by sending an email to your SWAC members to ask them to review Section 5 of your Plan and including a copy of that email with your final Plan submittal.*

Please contact me at david.pater@ecy.wa.gov or 360-790-5771, if you have any questions. We look forward to receiving your final submittal packet.

Sincerely,

David Pater

David Pater
Solid Waste Planner
Department of Ecology, SWRO
Solid Waste Management Program

cc: Peter Guttchen, Department of Ecology
Peter Lyon, Department of Ecology

Department of Ecology
Preliminary Review of Clallam County Draft Solid Waste Management Plan
(SWMP - January 2021)

March 18, 2020 – david.pater@ecy.wa.gov

In completing this review, we primarily used the following references. Where they were directly relevant to a specific comment, we provided more detail on how to find out more.

1. **Guidelines for Development of Local Comprehensive Solid Waste Management Plans and Revisions**
<https://fortress.wa.gov/ecy/publications/documents/1007005.pdf>. On page 109 of this document is Appendix K: Checklist of Required Planning Elements which I have shared with you and your SWAC. I use this a guide to ensure your Plan is complete.
2. **RCW 70A.205.045** that defines what's required in local Solid Waste Management Plans
<http://app.leg.wa.gov/RCW/default.aspx?cite=70A.205.045>
3. **RCW 70A.205.110(3)** which defines the composition and responsibilities for a SWAC
<http://app.leg.wa.gov/RCW/default.aspx?cite=70A.205.110>

Required Changes

Chapter 7, Recycling, Section 7.1 Introduction, Urban-Rural Designation

[70A.205.050](#) requires counties and cities develop “clear criteria for designating areas as urban or rural for determining waste reduction and recycling service levels.” [RCW 70A.205.045\(7\)\(i\)](#), states that these “criteria shall include:

- Anticipated recovery rates and levels of public participation
- Availability of environmentally sound disposal capacity
- Access to markets for recyclable materials
- Unreasonable cost impacts on the ratepayer over the six-year planning period
- Utilization of environmentally sound waste reduction and recycling technologies, and other factors as appropriate.”

This section goes on to state that “in urban areas, these programs shall include collection of source separated recyclable materials from single and multi-family residences, unless the department approves an alternative program.” And, “in rural areas, these programs shall include but not be limited to drop-off boxes, buy-back centers, or a combination of both, at each solid waste transfer, processing, or disposal site, or at locations convenient to the residents of the county. The drop-off boxes and buy-back centers may be owned or operated by public, nonprofit, or private persons.”

To meet this requirement, the County could develop an alternative program that Ecology must approve. However, in lieu of a developing alternative program, we recommend including something like the following, which is a revised version of the current language in your Plan addressing this requirement.

For the purposes of this plan, the Cities of Port Angeles and Sequim are designated as urban. In these cities, source separated collection of recyclables from single and multi-family residences is provided. All other parts of the County including the City of Forks are designated as rural. This is because recovery rates from and public participation in source separated collection of recyclables in these areas is anticipated to be low. In addition, providing these types of services would have unreasonable impacts on rate payers in these areas.

The incorporated City of Forks is designated as rural based on the following specific criteria:

- **Population size:** *The population of Forks is less than 5,000. This customer base is not large enough to support curbside recycling collection and would have unreasonable impacts on rate payers in the City over the six-year planning period.*
- **Current levels of solid of solid waste services:** *Garbage collection is not mandatory in Forks, further reducing the customer base needed to support cost-effective curbside recycling services for single- and multifamily residences.*
- **Distance from recycling markets:** *Forks is far from current markets and processing facilities for recyclables, significantly increasing the cost to transport recyclables for processing and remanufacture.*

We also recommend you include the following in this section:

- A description of the types of recycling services available to Forks residents including the location of public, private, or non-profit drop-off sites and what can be recycled at these facilities.
- Estimated recovery rates from, and use of, these facilities by Forks residents.

Chapter 11, Section 11.13. Six-Year Construction and Capital Acquisition Plan:

State law (RCW 70A.205.075) requires that solid waste plans include a construction and capital acquisition program for six years into the future. This requirement is generally interpreted to apply only to public facilities, since a solid waste plan cannot dictate construction schedules and capital acquisitions by private companies (except in limited cases pursuant to contracts and other agreements).

Section 11.13 is a very good summary that explains the plan context of the RCW requirement. The Regional Solid Waste Export and Transfer System, which includes the Regional and Blue Mountain Transfer Stations, is operated by the City of Port Angeles and is the largest MSW and recycling collection/transfer facilities in Clallam County. The SWMP should at a minimum address the Regional System's construction and capital acquisition needs over the next 6 years. The City's closed landfill's significant long term maintenance and monitoring costs are also addressed in their CFP.

Port Angeles has recently posted their [2021-2026 Preliminary Capital Facilities Plan \(CFP\)](#) for public review. The solid waste section of the CFP (which begins on page 169) includes all of the information necessary to meet the requirements of RCW 70A.205.045(3)(c) for "inclusion of a six-year construction and capital acquisition program for solid waste handling facilities" Ecology suggest the solid waste section be extracted from the adopted final version of the City's CFP and incorporated into the SWMP as an appendix. This appendix should also be cross referenced within section 11.13. It would also be

appropriate to include a link to the City's main CFP web page within section 11.13. The CFP will be adopted by the end of the year, if it hasn't been adopted already.

Recommended Changes:

Chapter 1, Section 1.1:

On the SWMP cover and in this section identify SWMP as a combined solid waste and hazardous waste management plan and the six years the plan covers. Ex: **Clallam County Solid and Hazardous Waste Management Plan for Years 2021 to 2026**. Making this change will make it clear it is a combined plan, will act as a reminder about then the Plan needs to be updates, and will maximize the amount of time the SWMP is considered current before your next update needs to be completed.

Chapter 1, Section 1.4, Required Minimum Content of Plan:

Related to the hazardous waste plan, appendix B: Additions from [RCW 70A.300.350](#)(1)(b)(i) & (ii) are recommended:

- Proper methods of handling, reducing, recycling and disposal of waste.
- Potential hazards to human health and the environment resulting from improper use and disposal of waste

These elements are adequately addressed within Appendix B and should be listed in section 1.4.

Chapter 6, Section 6.5, Recommendations for Waste Reduction:

The recommendations are comprehensive, but lack specifics. To more fully meet the intent of [RCW 70A.205.045](#)(6), we suggest you develop and include more locally focused recommendations that build upon existing efforts described in section 6.2, and that more specifically meet the need for waste reduction education in Clallam County. Of course, these recommendations can only be implemented if the needed resources are available. By including them in the SWMP, it will be easier to secure State and possibly other grant funding to support them. Any new recommendations should also be carried over to applicable chapter 11 sections.

Chapter 9, Miscellaneous Waste:

We recommend you include two additional sub-sections to address waste tires and White Goods. These sections should include definitions and current collection, disposal and recycling options and programs for these materials, including current transfer or disposal sites, and tire pile sites.

Example Definitions:

White Goods: Large household appliances, also known as "white goods," are defined as appliances, such as washing machines, water heaters, clothes dryers, stoves, refrigerators and freezers. White goods are easily recycled for their metal value after an appliance has been stripped of insulation, plastic, glass, non-ferrous metals, lubricants, refrigerants, and other contaminants. Most of the materials in white goods are recyclable, but environmentally threatening components, such as PCB-contaminated capacitors in older appliances, mercury-

containing switches and oil-filled compressors, or refrigerants in refrigerators, freezers or air conditioners can cause environmental contamination when damaged.

Waste Tires: RCW [70A.205.440](#) defines “waste tires” as “tires that are no longer suitable for their original intended purpose because of wear, damage or defect.” It defines “storage” or “storing of tires” as “the placing of more than 800 waste tires in a manner that does not constitute final disposal of the waste tires.” It defines “transportation” or “transporting” as “picking up or transporting waste tires for the purpose of storage or final disposal.”

Chapter 10, Section 10.5, Recommendations:

A solid waste enforcement recommendation should be included to address illegal dumping, which is described as a significant problem in the County. The new recommendation should also be added to Table 11-1 under Chapter 10, Regulation and Administration.

Chapter 11, Table 11-1, Implementation Summary for Recommendations:

A recommendation for 20-year disposal options should be added to Table 11-1 under Ch. 5 Disposal.

Chapter 11, Section 11.14. TWENTY-YEAR IMPLEMENTATION SCHEDULE:

Cross reference Table 11-1 recommendation WE1 which recommends that “Beginning in 2023 a request for proposal process be prepared for a new waste export and disposal contract for the RTS”. This will strengthen the relationship between the 20-year schedule and the future waste transfer contract.

Provide additional evidence of SWAC participation, this includes:

- Roster of SWAC members: (downloaded from County web site)
- SWAC by-laws: (downloaded from County web site).
- Evidence of SWAC participation in the SWMP update process
- Documentation that the SWAC approved the preliminary draft. Applicable meeting minutes and agenda would address this item.

Ecology recommends a separate appendix for SWAC information.